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February 27, 2019

Attn: Judge Paul A. Engelmayer
United States District Court Courtroom
40 Foley Square, Room 2201
New York, NY 10007

**RE: GORDON FLATT V JOHN DOE
19-CV-113-PAE**

Dear Judge Engelmayer:

Our firm was retained yesterday evening by a party with a material interest in the Nest Labs account subject to a subpoena issued in the above referenced matter (aka John Doe). Our firm contacted counsel for the Plaintiff seeking a seven day extension of time to permit counsel to review the subpoena, the related civil complaint and conference with Plaintiff's counsel prior to litigating the subpoena. Counsel for the Plaintiff has yet to consent or object to our request.

As counsel for an interested party in the Nest Labs account (aka John Doe), our firm objects to the release of any information related to the Nest Labs account and objects to the issuance of a subpoena, as the subpoena is based upon false allegations and unsubstantiated claims that the Plaintiff knows to be false, is overly broad, an unnecessary invasion of privacy and an abuse of process.

For the reasons set out in this letter counsel for a party with a material in the Nest Labs account (aka John Doe) respectfully request that this Court grant counsel seven days in order to fully brief the issues raised by counsel for objecting to the subpoena.

If there are any questions please do not hesitate to contact our firm.

Best Regards,

Ryan G. Blanch
Ryan G. Blanch, Esq.
Managing Partner
Counsel for John Doe